

## Privacy Notice

“Personal data” is any information about a living individual which allows them to be identified from that data (for example a name, photographs, videos, email address, or address). Identification can be by the information alone or in conjunction with any other information. It does not include anonymised data.

The processing of personal data is governed by the Data Protection Act 2018, the General Data Protection Regulation 2016/679 (GDPR) and other legislation relating to personal data and rights such as the Human Rights Act 1998.

We are required, as are all businesses that hold your personal data, to provide you with certain information in relation to the lawful grounds for our ongoing processing of your personal data.

One of the rights is a right to be informed.

In order to fulfil that obligation, we have put together a privacy notice that clearly sets out how we collect and process your personal data, for what purposes we use your data, the legal grounds of processing such data, how we keep your data secure and your rights in relation to such data.

Pro Steel Engineering Limited is the **data controller** and we are responsible for your personal data (referred to as “we”, “us” or “our” in this privacy notice). We do not employ or use **data processors**.

Pro Steel Engineering tries to meet the highest standards when collecting and using personal information. We encourage people to bring it to our attention if they think that our collection or use of information is unfair, misleading or inappropriate. We would also welcome any suggestions for improving our procedures.

Our full contact details are:

Full name of legal entity: **Pro Steel Engineering Limited**

Postal address: **Unit 48a Symondscliffe Way, Severn Bridge Industrial Estate, Caldicot, Monmouthshire, NP26 5PW**

Telephone number: **+44 (0) 1291 424949**

Email address: **info@prosteelengineering.co.uk**

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### **ACCESS TO PERSONAL INFORMATION**

Pro Steel Engineering tries to be as open as it can be in terms of giving people access to their personal information. Individuals can find out if we hold any personal information by making a request in writing. If we do hold information about you we will:

- give you a description of it;
- tell you why we are holding it;
- tell you who it could be disclosed to;
- let you have a copy of the information in an intelligible form; and
- correct any mistakes at your request.

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive or refuse to comply with your request in these circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that

personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you.

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#### **DATA SECURITY**

We have put in place security measures to prevent your personal data from being accidentally lost, used, altered, disclosed, or accessed without authorisation. We also allow access to your personal data only to those employees and partners who have a business need to know such data. They will only process your personal data on our instructions and they must keep it confidential.

We have procedures in place to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach if we are legally required to.

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#### **DISCLOSURE OF PERSONAL INFORMATION**

In many circumstances we will not disclose personal data without consent. However when we investigate a complaint, for example, we will need to share personal information with the organisation concerned and with other relevant bodies.

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#### **DATA RETENTION**

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

When deciding what the correct time is to keep the data for we look at its amount, nature and sensitivity, potential risk of harm from unauthorised use or disclosure, the processing purposes, if these can be achieved by other means and legal requirements.

In some circumstances we may anonymise your personal data for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

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#### **SENSITIVE DATA**

We do not collect any Sensitive Data about you. Sensitive data refers to data that includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership.

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#### **VISITORS TO OUR WEBSITES**

When someone visits [www.prosteelengineering.co.uk](http://www.prosteelengineering.co.uk) we use a third party service, WORDPRESS to manage our website. We do not make, and do not allow WORDPRESS to make, any attempt to find out the identities of those visiting our website. Information we receive via completed website contact forms is stored within the content management system of our website.

If we do want to collect personally identifiable information through our website, we will be up front about this. We will make it clear when we collect personal information and will explain what we intend to do with it.

WORDPRESS is run by AUTOMATTICS. Here is a link to their Privacy Notice.

<https://automattic.com/privacy/>

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#### **E-MAIL**

We will monitor any emails sent to us, including file attachments, for viruses or malicious software. Please be aware that you have a responsibility to ensure that any email you send is within the bounds of the law.

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#### **INTERNATIONAL TRANSFERS**

We do not transfer your personal data outside the European Economic Area (EEA).

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#### **E-NEWSLETTER**

N/a

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#### **SOCIAL MEDIA**

N/a

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#### **JOB APPLICANTS, CURRENT AND FORMER EMPLOYEES**

Pro Steel Engineering is the data controller for the information you provide during the process unless otherwise stated. If you have any queries about the process or how we handle your information please contact us at [info@prosteelengineering.co.uk](mailto:info@prosteelengineering.co.uk).

What will we do with the information you provide to us?

All of the information you provide during the process will only be used for the purpose of progressing your application, or to fulfil legal or regulatory requirements if necessary.

We will not share any of the information you provide during the recruitment process with any third parties for marketing purposes or store any of your information outside of the European Economic Area. The information you provide will be held securely by us, whether the information is in electronic or physical format.

We will use the contact details you provide to us to contact you to progress your application. We will use the other information you provide to assess your suitability for the role you have applied for.

#### **Application stage**

We ask you for your personal details including name and contact details. We will also ask you about your previous experience, education, referees and for answers to questions relevant to the role you have applied for.

If you are unsuccessful for the position you have applied for, we may ask if you would like your details to be retained for a period of six months. If you say yes, we would proactively contact you should any further suitable vacancies arise.

#### **Conditional offer**

If we make a conditional offer of employment we will ask you for information so that we can carry out pre-employment checks. You must successfully complete pre-employment checks to progress to a final offer. We are required to confirm the identity of our staff, their right to work in the United Kingdom and seek assurance as to their trustworthiness, integrity and reliability.

You will therefore be required to provide:

- Proof of your identity – you will be asked to attend our office with original documents, we will take copies.
  - Proof of your qualifications – you will be asked to attend our office with original documents, we will take copies.
  - We will contact your referees, using the details you provide in your application, directly to obtain references
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- We will also ask you to complete a questionnaire about your health. This is to establish your fitness to work.

If we make a final offer, we will also ask you for the following:

- Bank details – to process salary payments
- National insurance number
- Emergency contact details – so we know who to contact in case you have an emergency at work

NOW: Pensions Gateway

Your details will be provided to NOW: Pensions Gateway who are the administrators of the Pension Scheme. You will be auto-enrolled into the pension scheme unless you chose to opt-out.

Health Management

ALERE HEALTHCARE CONNECTIONS provide our Occupational Health service.

They provide us with a fit to work certificates or a report with recommendations.

How we use your information

We will only use your personal data for a purpose it was collected for, or a reasonably compatible purpose, such as providing it to:

- Professional advisers including auditors and insurers;
- Training providers we may sub-contract to deliver our training courses;
- Clients who require information to arrange site access / authorisation.

We require all third parties to whom we transfer your data to respect the security of your personal data and to treat it in accordance with the law. We only allow such third parties to process your personal data for specified purposes and in accordance with our instructions.

For more information on this please email us at [info@prosteelengineering.co.uk](mailto:info@prosteelengineering.co.uk).

In case we need to use your details for an unrelated new purpose, we will let you know and explain the legal grounds for processing.

We may process your personal data without your knowledge or consent where this is required or permitted by law.

We do not carry out automated decision making or any type of automated profiling.

How long is the information retained for?

If you are successful, the information you provide during the application process will be retained by us as part of your employee file for the duration of your employment plus 6 years following the end of your employment. This includes any criminal records declarations, fitness to work, records of any security checks and references.

If you are unsuccessful at any stage of the process, the information you have provided until that point will be retained for 6 months from the closure of the campaign.

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## **COMPLAINANTS AND OTHER INTERESTED PARTIES IN RELATION TO A DATA PROTECTION OR FREEDOM OF INFORMATION COMPLAINT OR ENQUIRY**

When we receive a complaint from a person we make up a file containing the details of the complaint. This normally contains the identity of the complainant and any other individuals involved in the complaint.

We will only use the personal information we collect to process the complaint and to check on the level of service we provide. We do compile and publish statistics showing information like the number of complaints we receive, but not in a form which identifies anyone.

We usually have to disclose the complainant's identity to whoever the complaint is about. This is inevitable where, for example, the accuracy of a person's record is in dispute. If a complainant doesn't want information identifying him or her to be disclosed, we will try to respect that. However, it may not be possible to handle a complaint on an anonymous basis.

We will keep personal information contained in complaint files in line with our retention policy. This means that information relating to a complaint will be retained for two years from closure. It will be retained in a secure environment and access to it will be restricted according to the 'need to know' principle.

Similarly, where enquiries are submitted to us we will only use the information supplied to us to deal with the enquiry and any subsequent issues and to check on the level of service we provide.

When we take enforcement action against someone, we may publish the identity of the defendant in our Annual Report or elsewhere. Usually we do not, identify any complainants unless the details have already been made public.

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This privacy notice was drafted with brevity and clarity in mind. It does not provide exhaustive detail of all aspects of Pro Steel Engineering's collection and use of personal information. However, we are happy to provide any additional information or explanation needed.

If you are not happy with any aspect of how we collect and use your data, you have the right to complain to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). We should be grateful if you would contact us first if you do have a complaint so that we can try to resolve it for you.

This policy will be reviewed at least annually for its effectiveness.



**Signed: Richard Selby, Director**

**Dated: 19<sup>th</sup> January 2021**